

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

JAMESINA CRAWFORD, <i>et al.</i>,)	
)	
Plaintiffs,)	Case No. 4:14-cv-00130-AWA-RJK
)	
vs.)	JURY TRIAL DEMANDED
)	
NEWPORT NEWS INDUSTRIAL)	Judge Arenda Wright Allen
CORPORATION,)	
)	
Defendant.)	

JOINT MOTION FOR LEAVE TO AMEND SCHEDULING ORDER

Plaintiffs and Defendant Newport News Industrial Corporation (“Defendant”) (collectively, the “parties”) respectfully move this Court for leave to file an amended scheduling order. In support of their joint motion, the parties state:

1. As the Court has noted previously this is a “complex,” multi-plaintiff employment lawsuit.
2. On September 9, 2015, the Court issued an initial Scheduling Order in this case. Doc. 41. It was subsequently modified on April 13, 2016. Doc. 98.
3. Because of the extensiveness of discovery, motion practice, etc., originally-scheduled trial dates were stricken.
4. Following resolution of numerous motions for summary judgment and other post-discovery motion practice, on January 9, 2020, the Court reset trial in this case for October 14, 2020 at 10 a.m.
5. Due to the complexity of the case and number of remaining plaintiffs, the trial is scheduled for six weeks.

6. To assist in the smooth administration of the trial, the parties have worked cooperatively and agreed to various pre-trial deadlines to govern, for example, supplementation of discovery, exchange of exhibits and deposition designations, etc. The parties' Proposed Amended Scheduling Order is filed with this Motion as **Exhibit 1**.

7. Accordingly, the parties respectfully request the Court grant their motion for leave and amend the scheduling order(s) to adopt the deadlines proposed.

8. Because the parties agree to the relief sought and bring this as a joint motion, no hearing will be requested.

WHEREFORE, for good cause shown, the parties respectfully request the Court grant their Joint Motion for Leave to Amend Scheduling Order, adopt the deadlines proposed, and for such other relief as the Court deems proper.

RESPECTFULLY SUBMITTED,

/s/ Sharon Reyes

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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